

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE)	
IMPLANT PRODUCTS LIABILITY)	MDL NO. 2272
LITIGATION)	
)	
This Document Relates to the)	Master Docket Case No. 1:11-cv-05468
Below Listed Cases)	
)	Honorable Rebecca Pallmeyer

Frances Beaman v. Zimmer, Inc., et al., 1:11-cv-07547
Cheryl Gustafson, et al. v. Zimmer, Inc., et al., 1:11-cv-05746
David R. Langevin v. Zimmer, Inc., et al., 1:11-cv-05476
Elsie Alice Buehler v. Zimmer, Inc., et al., 1:11-cv-05749
Anita McCants, et al. v. Zimmer, Inc., et al., 1:11-cv-05757
Patricia Monroe v. Zimmer, Inc., et al., 1:11-cv-05734
James Krammes, et al. v. Zimmer, Inc., et al., 1:11-cv-05488
Robert Carr v. Zimmer, Inc., et al., 1:11-cv-00974
Beverly Goldberg v. Zimmer Holdings, Inc., et al., 1:11-cv-06425
Margaret Loveday, et al. v. Zimmer, Inc., et al., 1:11-cv-05752
Victoria Messina, et al. v. Zimmer, Inc., et al., 1:11-cv-06423
William A. Quade v. Zimmer, Inc., et al., 1:11-cv-07272
Donald C. Waterman v. Zimmer, Inc., et al., 1:11-cv-06097
Corda B. Gaddy v. Zimmer, Inc., et al., 1:12-cv-00089

NOTICE OF MOTION

TO: All Counsel of Record

PLEASE TAKE NOTICE that on **Friday, February 24, 2012 at 9:30 a.m.**, or as soon thereafter as may be heard, we shall appear before the Honorable Judge Rebecca Pallmeyer, U.S. District Court of the Northern District of Illinois, Eastern Division, 219 South Dearborn St., Chicago, Illinois and shall present the following motion: **Motion for Suggestion of Remand.**

PLEASE TAKE FURTHER NOTICE that the Motion for Suggestion of Remand has been filed electronically on the Master Docket for MDL No. 2272, In Re Zimmer NexGen Knee

Implants Product Liability Litigation, 1:11-cv-05468, and has been served upon all counsel of record for the above listed cases.

PLEASE TAKE FURTHER NOTICE that, due to the complexity of and number of individualized issues raised by the Motion for Suggestion of Remand, the Zimmer Entities¹ intend to request a briefing schedule similar to the schedule outlined in paragraph 9.4 of Case Management Order No. 1, and further intend to request that the Court set an independent hearing on the Motion for Suggestion of Remand on or shortly after March 13, 2012.

¹ For purposes of this Notice of Motion, "Zimmer Entities" includes the following defendants in this action: Zimmer, Inc., Zimmer Holdings, Inc., Zimmer Surgical, Inc., f/k/a Zimmer Orthopaedic Surgical Products, Inc., Wilson/Phillips Holdings, Inc., d/b/a Zimmer Wilson/Phillips, Orthopaedic Technologies, LLC, d/b/a Zimmer Tri-State (incorrectly named as (1) Zimmer Tri-State d/b/a Tri-State Orthopaedic, (2) Zimmer Tri-State d/b/a Zimmer, Inc., and/or (3) Zimmer Tri-State d/b/a Tri-State Orthopedic), K. Michael Melia, d/b/a Zimmer Melia & Associates, Inc. (incorrectly named as Zimmer Melia & Associates, Inc.), Zimmer Orthobiologics, Inc., and Zimmer US, Inc.

Dated: February 16, 2012

Respectfully submitted,

FAEGRE BAKER DANIELS, LLP

/s/ Andrea Roberts Pierson

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CERTIFICATE OF SERVICE

I certify that on February 16, 2012, a copy of the foregoing Notice Of Motion, was filed electronically. Parties may access this filing through the Court's system. I further certify that on February 16, 2012, a copy of the foregoing Notice Of Motion was sent by first-class United States mail, postage prepaid, to the following:

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